

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF IOWA
DAVENPORT DIVISION

IN RE:)		
Clayton R. Batchelor)		
Nicole R. Batchelor)		
Debtors)	Case No.	13-00330
)	Chapter	7
United Consumer)		
)		
Creditor.)		

MOTION FOR REDEMPTION

Now comes Clayton and Nicole Batchelor, Debtors by Bruce A. Buckrop, their attorney pursuant to Bankruptcy Code 722 and Bankruptcy Rule 6008, and respectfully represents as follows:

1. Prior to the filing of this proceeding you, Debtors, owned the following tangible personal property which was used primarily for personal, family and household use, to-wit:

Kirby Vacuum

2. The hereinabove described tangible personal property is subject to a valid security interest granted by Debtor to the hereinafter-named creditor, as secured for a consumer debt which is dischargeable under Chapter 7 of the Bankruptcy Code. The name and address of the subject secured creditor is as follows:

United Consumer
865 Bassett Road
Westlake, OH 44145

3. The hereinabove described tangible personal property was pledged as collateral to secure an indebtedness to the subject creditor, and has a fair market value of \$25.00.

4. The hereinabove described tangible personal property has been abandoned by the Trustee pursuant to Bankruptcy Code 554.

5. Your Debtor wishes to redeem the hereinabove described tangible personal property from the lien of the said creditor by payment to the creditor of the amount of its allowed secured claim.

WHEREFORE, your Debtor prays for the entry of an Order determining the amount of the allowed secured claim of United Consumer, and further requiring United Consumer, secured creditor, upon the receipt of the sum of \$25.00 representing its allowed secured claim, to release the subject property from the lien of its security interest, and that the Debtor have such other and further relief as is proper.

Clayton R. Batchelor
Nicole R. Batchelor
Debtors

BY: /s/ Bruce A. Buckrop
Bruce A. Buckrop

Bruce A. Buckrop
Buckrop & VanDeVelde
The Law Centre
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CERTIFICATE OF SERVICE

The undersigned certifies that the attached Motion for Redemption was served upon the Trustee of said estate(s), U.S. Trustee and all creditors on interest, by electronic notice or by depositing a copy thereof in United States Mail, postage prepaid, in envelopes addressed to each of them at their respective addresses as known.

US Trustee
Federal Building, Rm. 793
210 Walnut Street
Des Moines, IA 50309

Robert G. Schlegel
robert@washialaw.com
ia24@ecfbis.com

United Consumer
865 Bassett Road
Westlake, OH 44145

Bass & Associates
3936 E Ft. Lowell Road
Suite 200
Tucson, AZ 85712

Dated: March 26, 2013

By: /s/ Nancy Nouchanthavong